

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DAVID LEIBOWITZ, BENJAMIN  
LEIBOWITZ, JASON LEIBOWITZ, AARON  
LEIBOWITZ, and PINCHAS GOLDSHTEIN,

Plaintiffs,

v.

IFINEX INC., BFXNA INC., BFXWW INC.,  
TETHER HOLDINGS LIMITED, TETHER  
OPERATIONS LIMITED, TETHER  
LIMITED, TETHER INTERNATIONAL  
LIMITED, DIGFINEX INC., PHILIP G.  
POTTER, GIANCARLO DEVASINI,  
LUDOVICUS JAN VAN DER VELDE,  
REGINALD FOWLER, CRYPTO CAPITAL  
CORP., and GLOBAL TRADE SOLUTIONS  
AG,

Defendants.

Case No. 1:19-cv-09236 (KPF) (SN)

**CORRECTED MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States District Courts for the Southern District of New York, I, MICHAEL JASON LEE, ESQ., respectfully move this Court for an Order for admission to practice *pro hac vice* as counsel for Defendants iFinex Inc., DigFinex Inc., BFXNA Inc., BFXWW Inc., Tether International Limited, Tether Operations Limited, and Tether Holdings Limited in the above-captioned action.

I am in good standing of the bars of the State of California and District of Columbia and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached to this motion a declaration pursuant to Local Rule 1.3 and a Proposed Order.

Dated: November 7, 2019  
San Diego, California

Respectfully Submitted,

/s/ Michael Jason Lee  
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